

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

JARREN GENDREAU :  
 :  
vs. : Case No:1:14-cv-00337  
 :  
TOWN OF BRISTOL and :  
JOSUE D. CANARIO, :  
In his capacity as Chief :  
of Police of :  
the Bristol Police Department :

PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF HIS MOTION FOR LEAVE  
TO AMEND

Now Comes Plaintiff, Jarren Gendreau, and Respectfully moves this Honorable Court, pursuant to Rule 15 of the Federal Rules of Civil Procedure, for leave to file an AMENDED COMPLAINT, a copy of which is attached hereto. In support thereof the Plaintiff states that the proposed amended complaint maintains the allegations against the same defendants from the original complaint, but seeks to clarify that Plaintiff is seeking declaratory and injunctive relief on state statutory grounds more clearly identified by the Rhode Island Supreme Court's recent decision in *Gadomski v. Tavares*, No. 2014-72-M.P. (R.I. 2015) in addition to the more clearly plead state and federal constitutional claims. In further support, the Plaintiff relies upon the Memorandum of Law submitted herewith.

Wherefore, Plaintiff requests that this Honorable Court GRANT his Motion for Leave to Amend.

Petitioner,  
Jarren Ray Gendreau,  
By and through his Attorney,

/s/Matthew L. Fabisch

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of June, 2015, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Michael A. Ursillo      mikeursillo@utrlaw.com,  
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